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Attorney for Defendant

TONY MINH TRINH

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TONY MINH TRINH

Defendant.

Case No. S-04-0407-WBS

**STIPULATION TO CONTINUE
SENTENCING HEARING AND
PROPOSED ORDER**

IT IS HEREBY STIPULATED AND AGREED between plaintiff, United States of America, and defendant, TONY MINH TRINH, as follows: (1) Each party enters this agreement and these stipulations for good cause stemming from concerns to ensure adequate preparation and effective advocacy on behalf of each party's respective client; (2) Each party specifically requests this Court to allow that the sentencing hearing currently set for December 14, 2005 at 9:00 a.m. be vacated; and (3) Each party specifically requests that this Court schedule sentencing for December 21, 2005 at 9:00 a.m.

This office has communicated with federal probation officer, Karen Muesling, who is assigned to this case, and has no objection to the new court date.

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1 DATED: December 12, 2005

McGREGOR W. SCOTT
United States Attorney
By:

3 /s/ Mathew C. Stegman
4 MATHEW C. STEGMAN
Assistant U.S. Attorney

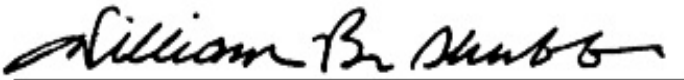
5 DATED: December 12, 2005

/s/ John R. Duree, Jr.
JOHN R. DUREE, JR.
Attorney for defendant,
TONY MINH TRINH

9
10 **ORDER**

11 IT IS HEREBY ORDERED that the imposition of judgment and sentence currently
12 scheduled for December 14, 2005 at 9:00 a.m. is VACATED, and the matter continued until
13 December 21, 2005 at 9:00 a.m. for imposition of judgment and sentence.

14 Dated: December 14, 2005

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17 WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE